

## REMARKS

Claims 46, 58, and 70 were objected to due to informalities. Accordingly, the Applicants have amended Claims 46, 58, and 70 to overcome these informalities.

### Claim Rejections - 35 U.S.C. §102

Claims 37-39, 41-44, 46-51, 53-56, 58-63, 65-68 and 70-72 were rejected as being allegedly anticipated by Morgan (U.S. 5,596,698) (hereinafter "Morgan"). Applicants respectfully traverse.

Independent Claim 37 recites a limitation whereby a plurality of substantially invisible codes is read and processed, as claimed. Independent Claim 37 further recites a limitation whereby a plurality of print elements associated with the plurality of substantially invisible codes are recognized, and the instructional response is determined and outputted, as claimed.

Morgan discloses a processor, a stylus and a speaker (see Morgan, Figure 3). Morgan further discloses that when a student writes, the student receives immediate feedback and that the computer prompts the student on the proper strokes, sequence, neatness, etc. (see Morgan, col. 4, lines 40-45). Additionally Morgan discloses that as the stylus touches and moves over the screen, the computer darkens the pixels under the stylus which shows what the user wrote (see Morgan, col. 7, lines 53-57). Morgan further discloses that a handwriting module analyzes what the student wrote in order to determine if the

answer is correct (see Morgan, col. 10, lines 31-34). The Applicants do not understand Morgan to teach or suggest reading and processing a plurality of substantially invisible codes, as claimed. In fact, the rejection admits that Morgan fails to disclose a plurality of substantially invisible codes, as claimed. Accordingly, Morgan could not have disclosed print elements associated with the plurality of substantially invisible codes, as claimed either.

Accordingly, Morgan does not disclose the recited limitations of independent Claim 37. As such, independent Claim 37 is patentable over Morgan, under 35 U.S.C. 102(b). Independent Claims 49 and 61 recite limitations similar to that of independent Claim 37 and are patentable for similar reasons. Dependent claims are patentable by virtue of their dependency.

Moreover, regarding Claims 48, 60 and 72 the rejection asserts that Morgan discloses the processor, input device, output device, and writing device are associated with a housing having a pen-like appearance, as claimed. The Applicants respectfully disagree because the stylus that has pen-like appearance is separate from the processor (see Morgan, Figure 3). Morgan discloses that when the stylus touches and moves over the screen, the computer darkens the pixels under the stylus (see Morgan, col. 7, lines 54-57). Accordingly, the screen digitizer is located under the stylus to detect the application of pressure and send the signal to the processor for processing (see Morgan, Figure 1). Therefore, the processor disclosed in Morgan is separate from the stylus. As such, Morgan does not disclose or suggest a writing device wherein the processor, input

device, output device and writing device are associated with a housing having a pen-like appearance, as claimed.

As such, allowance of Claims 37-39, 41-44, 46-51, 53-56, 58-63, 65-68 and 70-72 is earnestly solicited.

Claim Rejections - 35 U.S.C. §103

Claims 40, 45, 52, 57, 64 and 69 were rejected as being allegedly unpatentable over Morgan in view of Greanias et al. (U.S. 5,007,085) (hereinafter "Greanias"). The Applicants respectfully traverse.

The rejection admits that Morgan does not disclose expressly a stylus having an optical detector, a processor coupled to the optical detector and wherein the writing surface has a plurality of substantially invisible codes at a plurality of positions for determining a location of a plurality of different print elements on the surface, as claimed. The rejection relies on Greanias to remedy this failure. The Applicants respectfully submit that Morgan in addition to failing to disclose a writing surface with a plurality of substantially invisible codes, also fails to disclose or suggest reading and processing invisible codes, as claimed.

Greanias discloses a light pen where a location of the light pen is determined by detecting the coordinates of the dot of light scanning raster of the display (see Greanias, col. 1, lines 30-36). Greanias further discloses that the X and/or Y conductors are driven by a 40 kHz oscillator driver, so that the X and Y

conductors act as a transmitter of electromagnetic radiation, and the stylus acts as a transponder responsive to that radiation (see Greanias, col. 4, lines 17-23). Accordingly, Greanias discloses that the light pen detects the coordinate of the dot of light by acting as a transponder responsive to an electromagnetic radiation received from conductors. The Applicants do not understand electromagnetic radiation to be the same as a plurality of substantially invisible codes, as claimed.

Greanias further discloses that a computer system may establish the stylus position by receiving the grid signal from a horizontal and vertical wire grids, which are driven by electromagnetic signal, embedded in the surface of the tablet (see Greanias, col. 1, lines 39-44). For similar reasons, the Applicants do not understand receiving electromagnetic signal to be the same as a plurality of substantially invisible codes, as claimed.

Accordingly, since Greanias does not disclose or suggest reading and processing a plurality of substantially invisible codes, as claimed, it could not have disclosed that a plurality of print elements associated with the plurality of substantially invisible codes are recognized, and the instructional response is determined and outputted, as claimed. Similarly, Greanias could not have disclosed or suggested a memory unit comprising code for audio outputs corresponding to the print element, as claimed either. For similar reasons, Greanias could not have disclosed or suggested a writing surface with a plurality of substantially invisible codes at a plurality of positions, as claimed either.

Accordingly, Greanias fails to remedy the failures of Morgan with respect to limitations of independent claims as discussed above. Additionally, Greanias fails to remedy the failures of Morgan with respect to the limitations of dependent Claims 40, 45, 52, 57, 64 and 69. As such, Greanias alone or in combination with Morgan does not render Claims 40, 45, 52, 57, 64 and 69 obvious, under 35 U.S.C. 103(a). As such, allowance of Claims 40, 45, 52, 57, 64 and 69 is earnestly solicited.

For the above reasons, the Applicants request reconsideration and withdrawal of the rejections under 35 U.S.C. §102, and 35 U.S.C. §103.

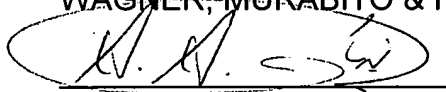
### CONCLUSION

In light of the above listed remarks, reconsideration of the rejected Claims is requested. Based on the arguments presented above, it is respectfully submitted that Claims 37-72 overcome the rejections of record and, therefore, allowance of Claims 37-72 is earnestly solicited.

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Dated: Aug 25th, 2006

Respectfully submitted,  
WAGNER, MURABITO & HAO LLP

A handwritten signature in black ink, appearing to read 'A. Tabarrok', is written over a horizontal line.

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